

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

DR. SARI EDELMAN,

Plaintiff,

– against –

NYU LANGONE HEALTH SYSTEM, NYU LANGONE  
HOSPITALS, NYU LANGONE MEDICAL CENTER, NYU  
LANGONE NASSAU RHEUMATOLOGY, NYU SCHOOL  
OF MEDICINE, NYU GROSSMAN SCHOOL OF  
MEDICINE, NYU HOSPITALS CENTER, ANDREW T.  
RUBIN, DAVID KAPLAN, JOSEPH ANTONIK, and  
JOSHUA SWIRNOW,

Defendants.

Case No. 1:21-cv-502 (LJL)

**NOTICE OF MOTION**

**PLEASE TAKE NOTICE**, that defendants NYU Langone Health System, NYU Langone Hospitals, and NYU Grossman School of Medicine, a Division of New York University, f/k/a “NYU Hospitals Center” s/h/a “NYU Langone Medical Center,” “NYU Langone Nassau Rheumatology,” “NYU School of Medicine,” “NYU Grossman School of Medicine,” and “NYU Hospitals Center” (collectively, “NYU”), and Andrew T. Rubin, David Kaplan, Joseph Antonik, and Joshua Swirnow (collectively, together with NYU, “Defendants”), upon the annexed Defendants’ Memorandum of Law in Support of Defendants’ Motion for Judgment as a Matter of Law Pursuant to Fed. R. Civ. P. 50(b) and to Alter or Amend the Judgment Pursuant to Fed. R. Civ. P. 59(e), the Declaration of Richard L. Steer, Esq., and the exhibits annexed thereto, and upon all the pleadings and prior proceedings had herein, shall move this Court, before the Honorable Lewis J. Liman, at the courthouse located at 500 Peal Street, Courtroom 15C, New York, New York 10007, at a time to be determined by the Court, for an order, pursuant to Federal Rules of Civil Procedure 50(b) and 59(e), granting Defendants’ motion for judgment as a matter of law, to vacate the verdict and dismiss Plaintiff’s retaliation claims, and to vacate the award of front pay

or, alternatively, granting remittitur and limiting the front pay award to the amount of \$137,400 that Plaintiff sought in the Joint Final Pretrial filings, and for such other and further relief that to this Court may seem just. Defendants respectfully request oral argument.

Dated: New York, New York  
August 23, 2023

**TARTER KRINSKY & DROGIN LLP**  
*Attorneys for Defendants*

By: /s/ Richard L. Steer

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